

Statement from Bishop's Tachbrook Parish Council relating to the Matters and Issues identified by the Inspector.

Represented by Councillor Ray Bullen Dipl. Arch., RIBA.

Matter 3 –The supply and delivery of housing land
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Issue.

Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

Policy DS7 and Housing Trajectory

Questions

- 1) ***Taking the Council's latest Housing Trajectory (June 2016) what is the estimated total supply of new housing in the plan period 2011-2029? How does this compare with the planned level of provision of 932 dwellings per annum?***

Addressing the question, concerning the ***Housing Trajectory (June 2016)***, is complex. It is a very confusing document and appears to have the following faults, amongst other things -

1. It is out of date and is said to be only taking data up to March 2016.
2. It is not comprehensive and excludes a large number of dwelling sites with planning permission that should complete in the plan period – further explanation follows.
3. On the summary sheet for all sites, it does not say where the completions from 2011 and 2015 come from.
4. Does not include the '*commitments @Apr 13'* page that total 1,591.
5. On the All sites sheet, line 22 shows 932 for each programme year but does not give the total, which is 16,776. Line 21 shows forecast completion from 2015 to 2029 for each year but not the total. This is 7,869, but if the completions in line 20 totalling 1,483 are added, the total that will complete by 2029 is 9,352. This does not appear to include anything for small urban SHLAA sites as the formula is reporting the wrong line.
6. Replacement dwellings and permissions that are now out of date are included and ought not to be.
7. Some cases of original permissions being varied by later permissions are not updated.

The Parish Council has been assessing the correct position and has built a robust and verifiable list of sites that have or will give dwelling completions between 1st April 2011 and 31st March 2029, the programme period.

The assessment takes account of

- A WDC website file 2._Monitoring_and_5YLS_14.xls - monitoring updates down to line 161

- B WDC website file 2._Monitoring_and_5YLS_14.xls - new sites 1/4/2013 to 1/4/2014 line 161 to 250
- C WDC website file 3._Five_YSH_April_to_Aug_14-1.xls

plus the 'Housing Supply Topic Paper' of April 2016, the 'Housing Target Trajectory Sites' of June 2016 and the 'cumstartscumcomps12FOI.xlsx' to 'cumstartscumcomps15 FOI.xlsx' papers of September 2016. The WDC website for planning applications and building regulations have also been consulted and from all this data it is clear that there are currently 10,124 planning permissions granted that should contribute to completions by 2029. Of these, 2,672 have been completed, 2,620 are under construction, leaving 4,832 not yet started. Full detail is given in the spreadsheet attached at Appendix 1.

Analysis of the data shows that

- a) The Housing Supply Topic Paper (HSTP) of April 2016, the Housing Target Trajectory Sites (HTS) of June 2016 are not comprehensive.

Table 1 shows that of the net 10,124 dwellings granted permission, 2,274 are not included in either paper; 5,365 appear in both papers, 2,245 appear in the HSTP only and 248 appear in the HTS. The HSTP identified 36 sites and the HTS 4 sites that were not in any other lists. See HSTP Comparison sheet of Appendix 1 that demonstrates the compilation of Table 1.

Table 1 Comparison of sites included in the Housing supply Topic & Housing Target Trajectory Sites Papers							
	market	affordable	gross	net	Not started	started	complete
TOTALS	6745	3375	10189	10124	4832	2620	2672
not found in HSTP or HTS	1790	486	2307	2274	624	67	1583
in Housing Supply Topic Paper(HSTP)	1625	624	2255	2245	1843	339	63
in Housing Target Trajectory Sites(HTS)	227	14	248	240	59	45	136
in both HSTP & HTS	3103	2251	5379	5365	2306	2169	890

- b) Similarly, not all of the sites appear in the Cumulative starts/completions papers so it is not clear what numbers are carried into the final assessment. These appear to be a historic updating of past assessments.

Table 2 shows that of the 10,124 net dwellings found, only 6,139 are in the cumulative start/completions paper (CSC). This omits 3,985, 714 of which are completions and 346 are being built. See CUM START Comparison sheet of Appendix 1 for the compilation of Table 2. This highlights in colour code sites that do not qualify due to replacements, holiday accommodation, out of date and similar reasons.

Table 2 Analysis of known sites that are not included in the CSC							
	market	affordable	gross	net	Not started	started	complete
TOTALS	6745	3375	10189	10124	4832	2620	2672
NOT IN CSC	2726	1266	4014	3985	2925	346	714
IN CSC	4019	2109	6175	6139	1907	2274	1958

c) Dwellings completed between 1st April 2011 and mid October 2016.

Table 3 shows the annual completions as found through the Building Regulation completions records plus some site inspections. This should be regarded as a minimum since there are a considerable number of cases where the start on site is recorded but a completion date is not given. This applies, particularly, to sites where the applicant uses an approved Inspector and completion dates either come back late or not at all. A total of 2,672 completions are known to have been completed, with annual totals as shown in Table 3. This is a different result to the WDC HTS paper of March 2016 up to the 14/15 year.

Table 3 Actual dwelling completions 2011-2029 up to mid October 2016							
Year	11/12	12/13	13/14	14/15	15/16	16/17*	
Annual total	111	356	376	710	656	463	
Cumulative total	111	467	843	1,553	2,209	2,672	
Completions from WDC HTS paper March 2016	144	262	345	732			
Cumulative total	144	406	751	1,483			

* as at October 2016.

d) Spatial distribution of dwelling sites

Table 4 shows the spatial distribution of dwellings granted planning permission by October 2016 in Urban, Growth and Limited Growth Village sites.

Table 4 Spatial distribution of dwellings granted permission by October 2016					
U	LEAMINGTON	2,177	LIV	BEAUSALE	22
U	KENILWORTTH	423	LIV	HILL WOOTTON	2
GV	BISHOPS TACHBROOK	2,116		WAPPENBURY	2
	HONILEY	1	LIV	BUBBENHALL	3
GV	RADFORD SEMELE	312	LIV	NORTON LINDSEY	4
U	LILLINGTON	33	LIV	SHERBOURNE	2
U	WARWICK	1,963	GV	CUBBINGTON	13
New U	SOUTH OF WARWICK & LEAMINGTON	2,167	LIV	BADDESLEY CLINTON	25
LIV	STONELEIGH	175		BUDBROOKE	1
LIV	ROWINGTON	18	LIV	WESTON UNDER WETHERLEY	1
U	WHITNASH	206	GV	HATTON	13
LIV	WASPERTON	1	LIV	ASHOW	1
GV	BURTON GREEN	2	U	COVENTRY (boundary)	1
LIV	HASELEY KNOB	6	U	WARWICK UNIVERSITY	95
LIV	LAPWORTH	27	GV	BAGINTON	1
GV	BARFORD	125	LIV	MILVERTON	72
GV	LEEK WOOTTON	114		TOTAL	10,124

- e) Identifying a comprehensive assessment of the correct current position of planning permissions given, the number of completions, under construction and not started - An explanation of the Table in Appendix 1.

Appendix 1 lists all the sites found, listed in order of the planning application numbers following the colour codings.

The colour codings in columns A & B relate to the appearance of sites in the HSTP, HTS & CSC. Column A also includes DS11 site reference numbers eg H01.

Column C is also colour coded, dark green where data is satisfactory, yellow where for reasons specified the site does not qualify, or no longer qualifies, for inclusion and red where no robust evidence can be found to include that site in the calculation. Column C also includes a windfall indicator. All sites that are not in the Local Plan through DS11 but are genuine windfalls arising from planning applications received and granted are coded W. Sites that are in DS11 and which have been granted permission are coded 1 in column C. There are some sites that have been promoted through the Local Plan process but because they were granted permission early, they are not in DS11. These are coded WLP in column C. Hence unless a site is included in DS11 H01 to DSNEW3 it is a windfall site.

The windfall analysis shows that of the 10,124 sites identified, 5,102 are in DS11 but are committed with permission granted. 612 are coded WLP so are windfalls generated by the Local Plan process and 4,410 are genuine windfalls. This represents a genuine windfall average annual number of 792 dwellings per annum.

Column D codes each site location as Urban Rural or Village. 6,528 (64.5%) are urban sites, 2,950 (29.1%) were rural sites some of which will be designated urban extensions in the future and 647 (6.4%) are in villages.

Column E gives the planning application reference that gives access to detail of the site on the WDC website. This provides the date that the planning application was granted shown in column H, the number of dwellings each site provides in column G and access to drawings etc to determine any further detail necessary to correctly assess the site. Some sites need considerable examination to ensure the planning and building regulations records are for the same development. There is no cross reference connection between the two at the moment and the regulations website does not have the drawings on the website so that this can be verified. Normally the site descriptions tally.

Column I gives the Building Regulation reference that gives access to the start and completion dates that are entered in columns R & S when available. Where a Building Regulations application cannot be found, "no regs yet " is entered in column I.

The analysis includes a formula to identify any sites that have a planning permission that has expired and which either "no regs yet" applies or there is no renewal application or condition or other activity is known from the website detail. This results in 64 sites that are at risk unless renewal applications are received. This is 1.32% of the planning permissions that have not started yet. Others of this type, which definitely look as though they are dormant, are eliminated from the calculation and indicated by the yellow colour coding.

Where sites have renewal or amendment allocations these are retained at one of the relevant application numbers to avoid double counting with notes to connect the applications.

The analysis also shows that, for the 5 year housing land supply calculation, there are 2,066 sites that WDC advise will not complete within the next 5 years, but all of which will complete by 2029.

To determine ***the estimated total supply of new housing in the plan period 2011-2029*** first establish the sites to be included in DSD11 as Table 5

Table 5 sites to be included in the MDLP					
	site		JAN 16 MODS	granted	to come
DLP	H01	Wof Europa Wy	1210	1160	50
	H02 pt	Sof Harbry Lane	1605	1505	100
	H02 pt	sewage farm	215	0	215
	H03	E of whitnash	500	0	500
	H04	Red house Fm	250	0	250
	H05	NOT USED			0
	H06	Thickthorn	760	0	760
	H07	Crackley Triangle	90	93	-3
	H08	Oaklea Fm	20	0	20
	H09	Kenilwth school	250	0	250
	H10	station approach	212	212	0
	H11	Montague Rd	140	0	140
	H12	Ken Vith form	130	0	130
	H13	Sydenham	147	143	4
	H14	riverside H	100	0	100
	H15	Lspa fire station	deleted	0	0
	H16	court street	121	0	121
	H17	Theatre St.	37	39	-2
	H18	aylesbury Hs	20	0	20
	H19	Roswd Fm Bag	80	0	80
	H20	Barford House	8	0	8
	H21	sherbn nursery	60	69	-9
	H22	Bemridge Barfd	12	0	12
	H23	BT S of school	150	150	0
	H24	Burrow hill Burton Green	90	0	90
	H25	Rugby Rd Cubbington	35	0	35
	H26	Willow Sheet Meadow Cubbington	65	0	65
	H27	S Arras B H Magna	130	0	130
	H28	Hatton park	120	0	120
	H29	Kingswd Meadow House	30	0	30
	H30	ditto	inc	0	0
	H31	S of Stables kngswd	6	0	6
	H32	brome hall lane KW	12	0	12
	H33	W mill lane KW	8	0	8
	H34	Paddock Leek Wootton	0	0	0
	H35	Broome Cl LW	0	0	0
	H36	Tennis cts LW	0	0	0
	H37	Hayes car pk LW	5	0	5
H38	southam Rd Radford S	60	60	0	

ModLP	H39	Opus 40	85	85	0
	H40	E Ken woodside TC	640	0	640
	H41	E Warwick Rd Ken	100	0	100
	H42	Westwood Heath	425	0	425
	H43	Kings Hill	1800	0	1800
	H44	N of Milverton	250	0	250
	H45	Hazelmr +little acre Whitnash	75	0	75
	H46Aa	S Gallows Hill	450	450	0
	H46Ab	Strawberry Field	180	0	180
	H46B	Asps	900	900	0
	H47	S Wasperton Ln Bfrd	30	0	30
	H48	S Westham Ln Brfd	45	0	45
	H49	BT 7 Acre Close	30	50	-20
	H50	E Cubbington	95	0	95
	H51	S Lloyd cl. Hampton Magna	115	0	115
	H52	Spring lane Radford S	60	65	-5
	H53	Brownley Grn Ln Hatton Pk	55	0	55
DSNEW3	Leek Wtn pol HQ	115	114	1	
ModLP subtotal				1,664	3,786
DLP subtotal				3,431	3,247
total			12,128	5,095	7,033
total granted+to come					12,128

From Table 5 the total site specific allocation is 12,128 of which 5,095 are already committed by planning permissions. This leaves 7,033 sites in the Plan that are not yet committed.

Add permissions already granted from Table 1, add windfall allowance for the remaining period of 12.433 years @ 101 per annum as last sentence of para 32 and last sentence of para 34 of exam inspectors letter of 1st June 2015 and add vacant dwellings returned to use as recorded by DCLG, then Table 6 shows that the plan now contains 18,528 dwellings.

Table 6 Total Plan supply		
Total in MDLP	12,128	
deduct MDLP committed		5,095
remainder to be granted	7,033	
add permissions granted	10,124	
add windfall allowance for remaining years	1,256	
add vacants returned to use completed	115	
Total supply in the plan is	18,528	

This is 1,029 dwellings per annum and is 97 dwellings per annum more than the 932 arising from the Memorandum of Understanding.

2) What is the estimated total supply in the plan period from a) to f)?

Before answering this question it is important to state that because of the number that the submitted Local Plan is destined to deliver of 18,528, there are actually 4 different levels that the plan should be measured against. To work to a plan that is too high is counter to national policy if the disadvantages outweigh the benefits.

The 4 options that need to be considered are-

Option 1.

The full objectively assessed housing need for Warwick District as determined by the DCLG 2014-based projections published in July 2016 of 8,054 as set out in table 6 of the Parish Council's Written Statement for question 4 of Matter 2 (page 6) and included in the table to option 2 below.

To date, the permissions granted are 10,124 to which should be added the allowance for future windfalls of 1,256 plus vacant dwellings that have been returned to the housing stock of 115, a total of 11,495. This is 3,441 dwellings more than 8,045 that is now known to be needed by Warwick District to meet its needs and this without any further housing being allocated in the Local Plan. The WDC OAN is already exceeded by 43%.

If Coventry was not in need of the duty to cooperate because it could meet its need within the city boundary, this would be the position.

Option 2.

The full objectively assessed housing need for the Housing Market Area as determined by the DCLG 2014-based projections published in July 2016. This sets out that in total the HMA needs a total of 72,639 dwellings.

mid-2014 based DCLG projection	18 year housing need			Dwellings per annum
	actual 2011	2029 projection	additional need	
Coventry	128,447	169,520	41,073	2,282
North Warwickshire	25,856	28,353	2,497	139
Nuneaton & Bedworth	52,800	58,982	6,182	343
Rugby	42,085	49,698	7,613	423
Stratford on Avon	52,090	59,310	7,220	401
Warwick	58,714	66,768	8,054	447
C & W total	359,992	432,631	72,639	4,036
FOAN excluding Coventry			31,566	

At the initial hearing it was accepted that, based on the 2012-based projections, the HMA needed 4,004 dwellings per annum or 72,072 dwellings over the 18 year programme period.

The new 2014-based projection shows an increase in the HMA OAN of only 567 dwellings over the 18 year period.

In terms of dwellings per annum, there is an increase for Coventry from 1,811 to 2,282. The remainder of the HMA reduces, North Warwickshire from 204 to 139 dwellings per annum, Nuneaton & Bedworth from 422 to 343, Rugby from 453 to 423, Stratford on Avon from 508 to 401 and Warwick from 606 to 447.

Coventry continues to claim that it cannot find sites for more than 1,230 dwellings per annum without taking more Green Belt land within its city boundary.

On the presumption that the HMA shire authorities are willing to cooperate and release their Green Belt land in preference to Coventry using its own Green Belt land, then a fairer distribution of the unmet need than the proposal in the Memorandum of understanding is to distribute the 18,933 balance for Coventry between the shire districts proportionate to their share of the total shire district need of 31,566 as set out in the Parish Council's Written Statement for question 10 of Matter 2 (pages 7 & 8) and shown in Table 7, reproduced here.

mid-2014 based DCLG projection	18 year housing need				
	2029 additional need	% of shire districts FOAN	same % of Coventry's unmet need	total authority need	households per annum
Coventry - claimed max possible				22,140	1230
North Warwickshire	2,497	7.91%	1,498	3,995	222
Nuneaton & Bedworth	6,182	19.58%	3,708	9,890	549
Rugby	7,613	24.12%	4,566	12,179	677
Stratford on Avon	7,220	22.87%	4,330	11,550	642
Warwick	8,054	25.51%	4,831	12,885	716
		100.00%			
FOAN to meet duty to cooperate	31,566	+	18,933	72,639	4,036

If this is accepted, then Warwick District needs to identify 12,885 dwelling sites. To date, the permissions granted are 10,124 to which should be added the allowance for future windfalls of 1,256 plus vacant dwellings that have been returned to the housing stock of 115, a total of 11,495.

The Local plan then needs to identify a further 1,390 sites that, from a spatial strategy viewpoint, should be proximal to Coventry. This would allow selection from the balance of 7,033 sites identified in the modified draft local plan and would be

more consistent with the Framework because the exceptional conditions necessary to release any further Green Belt than the 1,390 sites need, do not exist.

Option 3.

The 932 dwellings per annum quoted in the question emanates from the Memorandum of Understanding. This is addressed in the Parish Council's Written Statement for question 11 of Matter 2 (pages 8 & 9) and shown in Table 8, reproduced here.

Memorandum of Understanding	Revised distribution	
	dpa	18 year
Coventry	1,230	22,140
North Warwickshire	264	4,752
Nuneaton & Bedworth	703	12,654
Rugby	620	11,160
Stratford on Avon	659	11,862
Warwick	932	16,776
C & W total	4,408	79,344

In this option, Warwick District needs to provide 16,776 dwellings. To date, the permissions granted are 10,124 to which should be added the allowance for future windfalls of 1,256 plus vacant dwellings that have been returned to the housing stock of 115, a total of 11,495.

The balance of 5,281 dwellings needs to be selected from the 7,033 dwellings currently not committed from the draft plan that, from a spatial strategy viewpoint, should be proximal to Coventry.

This represents, rather than a duty to cooperate to meet Coventry's unmet need, a deliberate expansion of Warwick District without good cause that does not justify release of Green Belt or open countryside to this extent. This was admitted by the District Council during the current hearing.

Across the HMA, the capacity is increased by 6,705 dwellings with an additional population increase of 15,536 people over and above the 138,992 people that the 2014-based projections anticipate, based on the assumption that the overall HMA household size at 2029 is 2.317 persons per household. This level of expansion is the equivalent of building more than another Warwick District Council with a 2011 census population of 137,736 by 12.43 years from now. This does not seem to be a practical possibility.

This volume of additional capacity could induce unacceptable demand on a wide range of infrastructure from roads to schools, NHS, public services and which will be largely unfinanced as these services are not met by development costs. They are met

by public authorities other than the District Council and those authorities are having to make severe budget cuts and do not have the capacity to meet the additional demand even if the physical demand of increasing that infrastructure can be devised.

It would also require the attraction of at least another 10,800 jobs to the District and Coventry based on the Nomis job/dwelling ratio of 1.615 for Warwick District over and above the jobs needed to employ the additional 138,992 people that the 2014-based projections anticipate.

The Memorandum of Understanding is not practical, affordable or deliverable in the timescale required and leads to unacceptable loss of Green Belt and countryside and is therefore not consistent with national policy.

Option 4.

Continue with the plan as currently proposed that will deliver 18,528 households but to do so requires all the sites listed in Table 5.

This plan arises because the District Council has not recognised the number of permissions granted so far and the progress made in their delivery, choosing to pursue greenfield sites in preference to brownfield and concentrating on development to the south of the District rather than providing where it is required to meet the unmet need. The Infrastructure implications have not been thought through and the fact that only major developments will make any contribution to the funding of infrastructure. Significant support from central government and through local taxation will become a problem, impacting on public authorities.

OPTIONS CONCLUSION

Option 4, the 'accidental option' is the submitted Local Plan. It should not be approved in its present format. It is very important to get a local plan in place at the earliest opportunity, as NPPF184 & 213 requires.

Option 2 is the Parish Councils preferred option for the reasons given and this could be achieved by approving the submitted Local Plan subject to the removal of all the DS11 sites that have not yet been committed, except those needed proximal to Coventry to provide the balance of 1,390 dwellings necessary to meet the unmet Coventry need.

To return to question 2

- a) completions since 2011 are given in Table 3 above. The District Councils submission does not correlate with the robustly evidenced analysis in Appendix 1.
- b) similarly, there are 10,124 existing planning permissions only 64 of which may not proceed beyond the grant of permission.
- c) only sites that are generated through planning applications are included in this number. A few of these are related to S106 agreements, for example to make alternative site arrangements for affordable dwellings, but are otherwise treated as a normal independent permission.

d) proposed site allocations in the Plan and its modifications are dealt with in the option statements. The most realistic plan is Option 2 where to achieve the HMA OAN only sites proximal to the location of unmet need, maximising the retention of Green Belt and open countryside and reducing travel to work miles and providing homes that can be afforded by normal families is realistic.

e) other sources to be encouraged include

- making provision for the expansion of student numbers at particularly Coventry University but also Warwick University by providing more student accommodation. This could release up to 5000 existing homes currently providing all student accommodation in Coventry to the normal housing market, helping to reduce the 18,933 household unmet need. About 14,500 students currently occupy 6,915 all student households according to census returns for 2011 and 6,745 students lived in university halls.
- PPG 3-037 says that Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan.

There are an increasing number of specially built C2 residential institutions where the people sell their home and buy into this form of housing and this releases homes back to the market. New homes completed in the programme period are counted, but homes built before the start date should also be considered for inclusion in the housing provision because they become available for new occupants as the elderly pass on. Where residents have their own front door they should be included as a full household but where the accommodation is respite care on a permanent basis, because this may leave some households with a partner in residence. These are only counted as 2/3rds, ie a 90 place institution would be counted as 60 households. This should also be applied to existing institutions whereas they are at the moment only applied to new provision. PPG does not differentiate between new and existing provision.

- HMO's could do with clarification. Non-specific HMO's , ie not students only, are a valuable provision for individuals who are looking for short to medium period of accommodation say for a temporary, but lengthy, works contract, whereas they may otherwise occupy a normal dwelling. If HMO's are registered for X persons but they are not normal flats, having some element of sharing facilities but with a lockable personal area, then the HMO should be considered as providing X single person households.

f) windfalls .

On page 4 where the detail of Appendix 1 is explained, it is found that of the 10,124 sites identified with planning permission, excluding windfalls generated by the Local Plan process, 4,410 are genuine windfalls. This represents a genuine windfall average annual number of 792 dwellings per

annum in the 5.57 years since the start of the plan period. The reasons for this include

- Introduction of permitted developments such as agricultural and offices to residential has released a considerable number of applications and fairly quick completions.
- During the 2000's as the economic circumstances led to the closure of building contractors, many of the tradesmen set up their own small units. They have encouraged owners to consider such conversions.
- Don't move, improve has led some homeowners to consider works that also produce additional households by splitting homes, extending and adding homes etc. This leads to regeneration that helps to improve the area as well as providing more households and
- Difficulties in retail premises that are finding it hard to continue trading especially those of a smaller scale suitable for conversions to homes have led to a considerable number of such applications.

It is appreciated that windfalls by their nature are not plannable, and cannot be guaranteed, but the large volume experienced in the last 5 years at 792 dwellings per annum is significant. In all the calculations in this paper windfalls have been included as set out in Exam 20 at 101 dwellings per annum for the future, but this probably is a very conservative estimate of the applications that will be received.

3) *What are the assumptions about the scale and timing of supply and rates of delivery from these various sources? Are these realistic? Has there been any discounting of sites with planning permission for example?*

From the version available to the Parish Council the Trajectory seems to be irrelevant because it only refers to a total of 9,352 dwellings. This is OK if we are using the 8,054 projection for Warwick District only. From Question 1 at the beginning of this Written Statement, at point 5 it is pointed out that the number of completions total 1,483 and for the remaining schemes to come it includes a total of 7,869.

Even if the small urban sites that are missing are added in, it makes very little difference increasing the sum to 9,582.

As regards discounting of sites with planning permission, if the progress of each planning permission is kept up to date and any stalled sites removed as the version in Appendix 1 does, then the effect of stalled sites is minimised. In the WDC version these seem to be carried through.

Within the BTPC version Appendix 1 there are only 64 sites that do not appear to have moved since permission was granted. Of the 4,832 sites that have not yet started, this is only 1.32% of the total. If the control of the programme is actively managed, at least non-performance would be recognised and evading action could be taken. At present WDC appear to review progress as infrequently as possible, perhaps because of the time it takes as it is currently organised.

This illustrates why any sites allocated by Warwick to meet Coventry's unmet need should remain within the control of Coventry so that they do not abdicate from the unmet need altogether and it would be for Coventry to progress chase or take avoiding action if their unmet need is not being provided.

Having said that, it appears to be custom and practice for developers to determine the rate at which they will deliver much needed homes. Most seem to work on 50 a year as this is about the rate they can sell thus enabling them to control the price, but it is a slow production rate in a contract situation. Is it possible to make planning permission conditional on achieving a programme? It is if the management for commissioning and contracting of the development is at the right level.

If the plan is to achieve 1000 dwellings per annum this will require 20 sites producing 50 a year each. There are not 20 major sites in the Local plan to achieve this.

From Appendix 1, it is clear that 2,620 dwellings are currently on site most with contractors looking to complete in the next year or so, as only 5 sites exceed 100 dwellings. Hence by 2017/18 the completions, together with those already completed, should be in the order of 5,290 without any new sites commencing. The trajectory anticipates 4,160.

4) *How has flexibility been provided in terms of the supply of housing? Are there other potential sources of supply?*

Not unless major changes occur in the procurement procedure. The flexibility seems to be to throw as much into the programme as possible in the hope that some of it will work. Hence we have a proposal for 18,528 when to meet the FOAN of the HMA we need 12,885.

5) *Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 47 of the NPPF? How should the level of completions since 2011 be taken into account? What would the requirement be for a five year supply including a buffer?*

The answer to this depends on which of the 4 options in the answer to question 2 is selected. This table gives the options.

They are calculated assuming a 20% buffer; the target completions are calculated on a daily basis so are always up to date; sites with planning permission are discounted as the WDC estimate of sites that will not complete in 5 years; and the windfall allowance follows the initial hearing result to be as Exam 20. To do this we have shown both WDCs windfall figure and a supplementary number to raise it to the figure agreed by the Inspector in Exam 20.

5 year HOUSING LAND SUPPLY calculation								
Table A		OPTION 1		OPTION 2		OPTION 3		OPTION 4
		excluding Coventry unmet need		including Coventry unmet need		M of U		Local Plan as submitted
Housing requirement 2011-2029			8054		12885		16776	18528
Annual rate			447		716		932	1029
next 5 years	(annual rate x 5)		2237		3579		4660	5147
plus buffer of 20%			447		716		932	1029
target completions @23 rd October 2016	2492			3987		5191		5733
less actual completions	2672			2672		2672		2672
less vacants returned to use complete	115			115		115		115
balance to add to 5 year supply			-295		1200		2404	2946
Total 5 year requirement			2390		5495		7996	9122
Table B		Housing supply						
Dwelling sites under construction			2620		2620		2620	2620
sites with pp less not complete in 5yr			2767		2767		2767	2767
windfall allowance as DB March 2016			283		283		283	283
add difference between DB & examiner			222		222		222	222
Total			5892		5892		5892	5892
5 year requirement 2016 to 2021			2390		5495		7996	9122
requirement per year			478		1099		1599	1824
number of years supply			12.33		5.36		3.68	3.23

Option 1 To meet Warwick District's OAN of 8,054 there is a 12.33 year housing land supply. If Coventry did not have an unmet need this would be the situation.

Option 2 To meet Warwick District's OAN and the proportionate distribution of Coventry's unmet need totalling 12,885 there is a 5.36 year housing land supply.

Option 3 To meet the Memorandum of Understanding with a disproportionate contribution from Warwick District totalling 16,776 there is only a 3.68 year housing land supply.

Option 4 To meet the current Modified Draft Local Plan that will generate 18,528 households, there is only a 3.23 year housing land supply.

In terms of the buffer -

Option 1 if Coventry had not declared that it could not meet its unmet need – and it is known that Coventry could have met the projection if it utilised all its own Green Belt within its boundary – Option 1 would be the correct option. In that case, the actual completions exceed the target completions and the 5% buffer would be appropriate. The number of years supply increases to 14.342 years.

Option 2 In this case, the target completions are 1200 more than the actual completions. Whether this constitutes a record of persistent under delivery that justifies a 20% buffer is a matter of judgement. Given that the local plan proposal includes many more sites than is necessary to meet the combined need of 12,885, and that sufficient sites have been identified to provide a 5.36 years supply using the 20% buffer but without taking into account any identified sites that are not yet committed, it could be held that this is not a record of persistent under delivery and keeping the buffer at 20% does not increase the prospect of achieving the planned supply nor influence choice and competition in the market for land. If the 5% buffer is applied, the number of years supply increases to 5.942.

In any case, if the donor authority to a duty to co-operate agrees to provide sites for the authority with the unmet need, these should be identifiable at the very least so that the provision of affordable housing has a clear hierarchy. That is to say, Coventry citizens needing affordable housing would apply to Coventry's housing department who would have to allocate outside of its boundary. Otherwise, the burden of allocating properties in Warwick District to Coventry citizens would fall to offices in Leamington or Warwick and so people in need could be offered homes anywhere in Warwick District. This would not meet the spatial strategy objectives.

The logical conclusion of this problem is for the sites identified in Warwick for Coventry's unmet need to be part of Coventry's 5 year housing land supply, ensuring that the objective of the 20% buffer to boost significantly the supply of housing remains with the authority that has the unmet need.

Option 3 If Warwick District volunteers to increase its Local plan beyond the basic requirement to meet the DCLG HMA household Projection and provide 16,776 households, if it does not manage to reach this larger number, but nevertheless does reach its required number, that is not a fair case to apply the 20% buffer because that is not a persistent under delivery of the required need. If the 5% buffer was permitted it would still not produce a 5 year supply, being 4.037 years and unless the planned trajectory increases way beyond its current level and realistically that can be achieved, then the 5 year supply will never be reached and the authority would be unable to resist proposals that do not meet the Local Plan. This negates the policy of local plan making.

Option 4 If the submitted local Plan is approved without amendment, then the probable outcome will be a plan providing 18,528 homes solely because the District Council is unaware of the number of planning permissions granted. But the plan would have to still comply with the 5 year housing requirement and it will be even harder for the 5year supply figure to be achieved. Even if the buffer is reduced to 5% there is still only a 3.528 year housing land supply.

To achieve completions of 18,528 homes, less the known completions of 2,787 in the remaining period of 12.43 years would require an immediate annual increase up to 1,266 completions per annum every year until the end of the programme. This is not realistic because that level of provision has not happened before and

the construction industry locally is unlikely to be able or want to achieve it. In addition, there is no controlling mechanism available to ensure that developers with permissions granted will meet this level of demand. It will also require infrastructure provision to keep up with it and this entails establishing the needs, financing the proposals, finding practical locations for the works and adding that building activity to the overheated construction market.

6) *Should the annual housing requirement figure be staggered to reflect the need for additional site allocations to meet unmet needs in Coventry and realistic lead in times (see Appendix 4 to Council's Housing Supply Topic Paper June 2016) i.e. a lower figure in the early years of the plan period, increasing later?*

If so what would be a reasonable basis for the annual figures? Should the early years be based on OAN for Warwick? How would this affect the requirement for a five year supply?

Given that we are over 5 years into the plan period and that no specific provision for Coventry's unmet need has yet been determined, only the current over-provision of 10,124 permissions granted will allow this to happen if a realistic level for Coventry is agreed. In the case of option 2 it would be achievable but options 3 and 4 are almost impossible.

The Coventry need can only be staggered because it should have been established before the 18year programme started if it was to be plausible. The early years can only be based on what we know and that is the needs for Warwick, and reducing the Green Belt release problem to manageable proportions should permit a satisfactory but reduced provision that meets the new household projections. At this stage, taking into account land release timing, preparation time and startup activities it is unlikely that any specific sites for Coventry will commence within 18 months followed by completions beginning 6 months or so later.

The early years up to now should be based on the Warwick OAN with a properly planned addition to meet the Coventry projection for the latter part of the programme period. The 5 year supply requirement should be based on the Warwick OAN until the Warwick OAN effect is worked out and added to the Warwick OAN on a phased basis when the detail is known. Option 2 would provide the combined OAN and on the assumption that Coventry's in-city programme is progressing to its programme the later addition of the Warwick dimension will still be in time to meet the demand that may exist at the end of the programme period. The household projections are given on an annual basis, so it is clearly not necessary to provide all the 2029 projections at an early part of the programme.

7) *Would the Local Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?*

If the plan as submitted is adopted then the answer is no, it is not realistic and a 5 year supply will not be maintained. Option 2 is the only option that will meet the projections and be realistically achievable.

8) *In overall terms would the Local Plan realistically deliver the number of dwellings required over the plan period?*

The submitted Local Plan is over ambitious and is unlikely to be deliverable in the time. Option 2 can be achieved and will meet the OAN requirement.

It is important that whatever plan is adopted is financially viable to all the public authorities affected by it whether at a local or national level. A firm financial plan should be properly in place at an early stage to ensure that costs can be met by all the authorities involved, not just Warwick District that comparatively has very little financial commitment to the services that need to be expanded to cope with additional population.

Projections have been changing quite substantially. It is important to ensure that commitments are not made to increases if there is doubt about the real outcome by 2029.

Reference has been made in the main written statement about matters such as

- household size projections across the whole of the HMA which if they are only marginally higher than the current projections would mean that 5,000 or so households would not be needed.
- If students could be provided with accommodation, this would release up to another 5,000 existing houses to the market and
- the reducing projections in the shire districts are likely to produce further reductions in projections due to the way that they are calculated.

Part of Coventry's projection increase may be cushioned by the fact that during the 1990's because of the demise of engineering and tool making in the city, the population fell from 327,000 to about 298,000 in 2004. The number of houses remained constant so this resulted in an apparent reduction in household size that has been projected forward, resulting in part of the high household projections. In addition, there is some capacity to absorb some of the projection increases that have just reached 327,000 in 2013. Hence the rise to be accommodated is from 327,000 to 409,400 or 82,400 and not from 317,000 to 409,400 or 92,400.

So until the 2021 census measures what is really happening in Coventry, and taking into account the ONS qualifications on the unattributable content of Coventry's projections that are now discontinued and are expected to work themselves through the revised method of assessment, it makes sense to carefully think through the projections for 2020 to 2029 before committing to another 20,000 households that may not be needed. Phasing the later stages makes a lot of sense.